# MISSOURI FISCAL YEAR (FY) 2016 STATE HOMELAND SECURITY PROGRAM (SHSP) PROGRAM MANUAL

# **ISSUED BY**

Missouri Office of Homeland Security (OHS)

# CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA)

CFDA Number: 97.067

CFDA Title: Homeland Security Grant Program

# **AUTHORIZING AUTHORITY FOR PROGRAM**

Section 2002 of the *Homeland Security Act of 2002*, as amended (Pub. L. No. 107-296), (6 U.S.C. § 603)

# APPROPRIATION AUTHORITY FOR PROGRAM

Department of Homeland Security Appropriations Act, 2016 (Pub. L. No. 114-113)

# **KEY DATES**

Application Start Date: 03/01/2016

Application Submission Date: 04/15/2016 – 5:00 p.m. CST

Anticipated Award Date: 08/24/2016

Period of Performance: September 1, 2016 through August 31, 2018

# FY16 STATE HOMELAND SECURITY GRANT PROGRAM MANUAL Local, Regionalization Local, Law Enforcement Terrorism Prevention Activity (LETPA)

# I. Funding Opportunity Description

# **Program Overview**

The purpose of the FY 2016 SHSP is to support state and local efforts to prevent terrorism and other catastrophic events and to prepare the Nation for the threats and hazards that pose the greatest risk to the security of the United States. The FY 2016 SHSP provides funding to implement investments that build, sustain, and deliver the 32 core capabilities essential to achieving the National Preparedness Goal of a secure and resilient Nation. The building, sustainment, and delivery of these core capabilities are not exclusive to any single level of government, organization, or community, but rather, require the combined effort of the whole community. The FY 2016 SHSP supports core capabilities across the five mission areas of Prevention, Protection, Mitigation, Response, and Recovery based on allowable costs. The SHSP funds a range of activities, including planning, organization, equipment purchases, training, exercise and management and administration across all core capabilities and mission areas.

# **Program Objectives**

The SHSP assists state and local preparedness activities that address high-priority preparedness gaps across all core capabilities where a nexus to terrorism exists. All supported investments are based on capability targets and gaps identified during the Threat and Hazard Identification and Risk Assessment (THIRA) process, and assessed in the State Preparedness Report (SPR). The SHSP is based on risk driven, capabilities-based, strategic plans that outline high-priority needs related to terrorism preparedness. For these plans to be effective, government officials and elected leaders, working with the whole community, must consider how to sustain current capability levels, while also addressing potential gaps.

# **Program Priorities**

The National Preparedness System is the instrument the Nation employs to build, sustain, and deliver core capabilities in order to achieve the Goal of a secure and resilient Nation. Complex and far-reaching threats and hazards require a collaborative and whole community approach to national preparedness that engages individuals, families, communities, private and nonprofit sectors, faith-based organizations, and all levels of government. The guidance, programs, processes, and systems that support each component of the National Preparedness System allows for the integration of preparedness efforts that build, sustain, and deliver core capabilities and achieve the desired outcomes identified in the Goal.

DHS/FEMA annually publishes the National Preparedness Report (NPR) to evaluate National progress in building, sustaining, and delivering the core capabilities outlined in the Goal. This

analysis provides a National perspective on critical preparedness trends for whole community partners to use to inform program priorities, allocate resources, and communicate with stakeholders about issues of shared concern.

Subrecipients are required to consider national areas for improvement identified in the 2015 NPR, which include the following core capabilities:

- Cybersecurity;
- Infrastructure Systems;
- Access Control and Identity Verification;
- Economic Recovery;
- Housing;
- and Long-term Vulnerability Reduction

# **II. Eligibility Information**

# **Eligibility Criteria**

The following Missouri entities are eligible to apply for 2016 SHSP funding:

- State Units of Governments
- Local Units of Government
- Nongovernmental Organizations, quasi-governmental organizations and Nonprofit Organizations

Applicants from within Missouri must apply for funding within their respective geographic area (Regions A Urban and A Rural-I). For additional information regarding geographic areas, applicants are encouraged to contact the Regional Planning Commission (RPC)/Councils of Government (COG) that provides administrative support for those regions. Regional maps and direct links to RPC/COG information are available at http://dps.mo.gov/dir/programs/ohs/regionalization/regionlisting.php and/or

http://dps.mo.gov/dir/programs/ons/regionalization/regionilsting.pnp and/or http://www.marc.org/Emergency-Services-9-1-1/Homeland-Security-(RHSCC)/General-Information/Service-Area-Map or by contacting the Office of Homeland Security, Local and State Assistance at (573) 526-9020.

#### **INELIGIBLE APPLICANTS**

Entities located within the geographical boundaries of the St. Louis Urban Area Security Initiative (UASI), which includes Franklin County, Jefferson County, St. Charles County St. Louis City, and St. Louis County are **NOT** eligible applicants.

# III. How to Apply

# **Application via WebGrants**

All applications must be submitted through WebGrants, the Department of Public Safety's online electronic portal located at <a href="https://dpsgrants.dps.mo.gov">https://dpsgrants.dps.mo.gov</a>. This system will be utilized

from the application phase through the administration and closeout phase for all funded projects. For more information regarding the application submittal process, contact your designated grant specialist.

The WebGrants System records all application submittal dates and times. Applicants will receive an electronic email message through the WebGrants System confirming receipt of the full application. Applications will not be accepted after the established deadline, 5 PM on April 15, 2016.

# **Dun and Bradstreet Data Universal Numbering System (DUNS) Number**

Applicants must provide a DUNS number with their application. This number is a required field within the SHSP application <a href="http://dpsgrants.dps.mo.gov">http://dpsgrants.dps.mo.gov</a>. Organizations should verify that they have a DUNS number, or take the steps necessary to obtain one, as soon as possible. Applicants can receive a DUNS number at no cost by calling the dedicated toll-free DUNS Number request line at (866) 705-5711.

# Obtain an Employer Identification Number (EIN)

DPS/OHS requires both the EIN and a DUNS number prior to the issuance of a financial assistance award and for grant award payment; both the EIN and DUNS number are required to register with WebGrants. The EIN base for an organization is the IRS Tax ID number. If these numbers are not correctly identified in the application, this may result in a delay in the issuance of the funding award and/or incorrect payment to a recipient organization.

# IV. Funding Information

As part of the FY 2016 SHSP application process applicants must develop a justification narrative that addresses the proposed investments. Each justification narrative must demonstrate how proposed investments:

- Address capability gaps identified as State priorities in the most recent SPR -December 2015;
- Align to state December 2015, and/or regional June 2015 THIRAs and national priorities, as outlined in the NPR; and
- Engage and/or impact the whole community, including children, older adults, pregnant women, individuals with limited English proficiency, individuals with disabilities and others with access and functional needs.

Subrecipients investing in emergency communications must describe how activities align to the statewide and/or regional Communication Interoperable Plan (SCIP). Subrecipients must coordinate with their statewide Interoperability Coordinator (SWIC) and/or statewide Interoperability Governance Body (SIGB) when developing an emergency communications investment prior to submission to ensure the project supports the statewide strategy to

improve emergency communications and is compatible and interoperable with surrounding systems.

# **Application Requirements**

Grant projects must be both feasible and effective at reducing the risks for which the project was designed; and able to be fully completed within the grant period of performance.

Complete application submission includes the following forms:

- Contact Information
- Grant Project Summary
- Grant Project THIRA
- Grant Project Background
- Project Milestones
- Deployable Resources
- SHSP Budget 2016
- Audit Certification
- NIMS Compliance
- Certified Assurances
- Other Attachments

# **Allowable Costs and Program Activities**

This list is not all-inclusive.

# **Allowable Planning Costs**

- Developing hazard/threat-specific annexes that incorporate the range of prevention, protection, response, and recovery activities
- Developing and implementing homeland security support programs and adopting ongoing DHS/FEMA national initiatives
- Developing related terrorism and other catastrophic event prevention activities
- Developing and enhancing plans and protocols
- Developing or conducting assessments
- Hiring of full- or part-time staff or contract/consultants to assist with planning activities (not for the purpose of hiring public safety personnel fulfilling traditional public safety duties)
- Materials required to conduct planning activities
- Travel/per diem related to planning activities
- Overtime and backfill costs (in accordance with operational Cost Guidance)
- Activities to achieve planning inclusive of people with disabilities and others with access and functional needs
- Coordination with Citizen Corps Councils for public information/education and development of volunteer programs
- Update governance structures and processes and plans for emergency communications

# Allowable Organizational Activities

- Reimbursement for select operational expenses associated with increased security measures at critical infrastructure sites incurred (up to 50 percent of the allocation)
- Overtime for information, investigative, and intelligence sharing activities (up to 50 percent of the allocation)
- Hiring of new staff positions/contractors/consultants for participation in information/intelligence analysis and sharing groups or fusion center activities (up to 50 percent of the allocation)

# Allowable Equipment Categories (Based upon the AEL)

- Personal Protective Equipment
- Explosive Device Mitigation and Remediation Equipment
- CBRNE Operational Search and Rescue Equipment
- Information Technology
- Cyber Security Enhancement Equipment
- Interoperable Communications Equipment
- Detection
- Decontamination
- Medical
- Power
- CBRNE Reference Materials
- CBRNE Incident Response Vehicles
- Terrorism Incident Prevention Equipment
- Physical Security Enhancement Equipment
- Inspection and Screening Systems
- Animal and Plants
- CBRNE Prevention and Response Watercraft
- CBRNE Aviation Equipment
- CBRNE Logistical Support Equipment
- Intervention Equipment
- Other Authorized Equipment

# **Allowable Training Costs**

- Overtime and backfill for emergency preparedness and response personnel attending DHS/FEMA-sponsored and approved training classes
- Overtime and backfill expenses for part-time and volunteer emergency response personnel participating in DHS/FEMA training
- Training workshops and conferences
- Activities to achieve training inclusive of people with disabilities
- Full- or part-time staff or contractors/consultants

- Travel
- Supplies
- Instructor certification/re-certification
- Coordination with Citizen Corps Councils in conducting training exercises
- Interoperable communications training
- Activities to achieve planning inclusive of people with limited English proficiency

# Allowable Exercise Related Costs

- Design, Develop, Conduct, and Evaluate Exercise(s)
- Full- or part-time staff or contractors/consultants
- Overtime and backfill costs, including expenses for part-time and volunteer emergency response personnel participating in DHS/FEMA exercises
- Implementation of HSEEP
- Activities to achieve exercises inclusive of people with disabilities and others with access and functional needs
- Travel
- Supplies
- Interoperable communications exercises
- Activities to achieve planning inclusive of people with limited English proficiency

# Allowable Management & Administrative Costs

Special note: Subrecipients may retain a maximum of up to five percent (5%) of funding passed through by the state solely for M&A purposes associated with the SHSP award.

- Hiring of full- or part-time staff or contractors/consultants to assist with the management of the respective grant program, application requirements, and compliance with reporting and data collection requirements
- Development of operating plans for information collection and processing necessary to respond to DHS/FEMA data calls
- Overtime and backfill costs
- Travel
- Meeting related expenses
- Authorized office equipment
- Recurring expenses such as those associated with cell phones and faxes during the period of performance of the grant program
- Leasing or renting of space for newly hired personnel during the period of performance of the grant program

## **Indirect Costs**

Indirect costs are allowable under this program as described in 2 C.F.R. § 200.414. With the exception of subrecipients who have never received a negotiated indirect cost rate as described in 2 C.F.R. § 200.414(f), subrecipients must have an approved indirect cost rate agreement with their cognizant Federal agency to charge indirect costs to this award. A copy of the approved

rate (a fully executed, agreement negotiated with the applicant's cognizant Federal agency) is required at the time of application.

# V. Application Review Information and Selection Process

## **SHSP**

# Local, Regionalization

Submitted applications will undergo a complete administrative and peer review process. The OHS will be responsible for administratively reviewing the FY2016 SHSP Regionalization applications for completeness, adherence to programmatic guidelines, and anticipated effectiveness of the proposed projects.

Applications will then be reviewed by peer reviewers in each region, utilizing the WebGrants System review process module. The review will utilize a risk based methodology to determine the likelihood of potential risk of terrorism/catastrophic event to people, critical infrastructure, and economic security. The following questions will be addressed during the peer review process to help determine whether an application should receive funding or not:

- Does the project align to a THIRA Capability Target (s)?
- Does the project address filling capability gap(s) from a THIRA Capability Target?
- Does the project create a new deployable Homeland Security resource?
- Does the project sustain and/or enhance a deployable Homeland Security resource?
- Does the project support a deployable asset that is NIMS Kind and Typed?
- Does the project build regional and/or statewide collaboration?

When the peer review is complete, WebGrants will produce an application average score for each applicant. The peer review group will provide a ranked listing of approved projects based upon the review process, justification and funding availability.

All FY 2016 SHSP Regionalization applications will require final approval by the Missouri Department of Public Safety (DPS) senior leadership. Subrecipients will be notified by the Regionalization Grant Specialist should any component of the submitted application require additional information.

# Local, LETPA

Submitted applications will undergo a complete administrative and peer review process. The OHS will be responsible for administratively reviewing the FY 2016 SHSP Regionalization applications for completeness, adherence to programmatic guidelines, and anticipated effectiveness of the proposed projects.

Applications will then be reviewed by peer reviewers from the LETPA working group, utilizing the WebGrants System review process module. The review will utilize a risk based methodology

to determine the likelihood of potential risk of terrorism/catastrophic event to people, critical infrastructure, and economic security.

When the peer review is complete, WebGrants will produce an application average score for each applicant. The peer review group will provide a ranked listing of approved projects based upon the review process, justification and funding availability.

All FY 2016 LETPA applications will require final approval by the Missouri Department of Public Safety (DPS) senior leadership. Subrecipients will be notified by the LETPA Grant Specialist should any component of the submitted application require additional information.

# VII. Post-Award Guidelines

# **Notice of Award**

Upon approval of an application, the award will be made in the form of a grant. Notification of award approval is made through the WebGrants System through an automated e-mail to the recipient point of contact listed in the initial application. Additionally a separate notice is sent with directions for acceptance of the award documents. The authorized grant official should carefully read the award package for instructions on administering the grant and to learn more about the terms and conditions associated with responsibilities under Federal awards.

# **Acceptance of Award**

Subrecipients must accept their grant awards no later than 30 days from the notification of award. The recipient shall notify the awarding agency of its intent to accept and proceed with work under the award, or provide a written notice of intent to decline. Funds will remain on hold until the recipient accepts the award through official correspondence, (e.g., written, electronic signature, signed letter or fax to OHS), and all other conditions of award have been satisfied, or the award is otherwise rescinded. Failure to accept the grant award within the 30 day timeframe may result in a loss of funds.

# **Equipment Inventory Form**

Subrecipients are required to complete the Equipment Inventory Form, within the DPS WebGrants online portal, for newly purchased inventory items in order to receive reimbursement for claims after the award is issued. It is the responsibility of the subrecipients to maintain an updated inventory of equipment for items purchased with federal funds.

# **Administrative and Federal Financial Requirements**

Subrecipients are obligated to submit various financial and programmatic reports as a condition of their award acceptance. Future awards and fund draw-downs may be withheld if these reports are delinquent.

# **Biannual Status Reports**

Biannual Status Reports must be submitted to the designated Grants Specialist twice a year through the WebGrants System. Reports should list progress towards completing project

milestones and objectives aligned in the initial application as well as any foreseen delays or concerns.

Status reports are due on the following dates:

Reporting Period	Report Due Date
December 1 – May 31	June 10
June 1 – November 30	December 10

# **Project Milestones**

Project milestones are used to determine if a project is on track to meet it's goals by the determined deadlines. The milestones created in the application will be reported on in the Biannual Status Reports. The following are the milestones along with examples of information to be included in each milestone.

# Initiating-Completing application for funding

 Example: Determine what items are needed. Complete application for funding via WebGrants. Submit completed application to OHS via WebGrants.
 Milestone Anticipated Start Date: March 1, 2016. Milestone Anticipated Completion Date: April 15. 2016.

# Planning-Awards completed, tracking mechanisms setup. Procurement/bid process initiated

 Example: Contract of Award received. Contract of Award signed and returned to OHS (RPC, COG). Submit EHP form to OHS. Receive approval memo from FEMA for EHP request. Send out RFP or contact vendors for bids. Anticipated Start Date: November 1, 2016, Anticipated Completion Date: January 15, 2017

# Executing-Procurement and ordering of approved budger items & initiation of outlined activities

 Example: Vendor selected from bids received. Document the chosen vendor along with the justification for the choice. Process internal ordering procedures (Creating a PO for approval). Submit order to the selected vendor. Milestone Anticipated Start Date: January 15, 2017; Milestone Anticipated Completion Date: January 30, 2017

# Executing-Deliver/Installation/testing of approved budget items & completion of outline activities

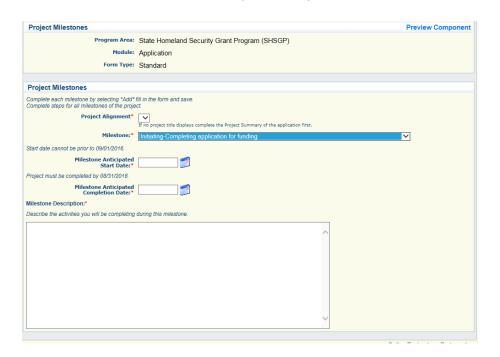
Example: Equipment received from vendor. Equipment inspected and tested.
 Equipment installed and tested. Proof of delivery obtained. Milestone
 Anticipated Start Date: February 15, 2017; Milestone Anticipated Completion
 Date: March 15, 2017

# Monitoring and Controlling-Inventory & record completion of purchases

 Example: Equipment added to the inventory. Invoices received from vendor for equipment and installation. Payment sent to the vendor. Milestone Anticipated Start Date: March 15, 2017; Milestone Anticipated Completion Date: May 1, 2017

# Closing-Reimbursement claims of expenses

 Example: Claim submitted to OHS including invoice, proof of delivery, proof of payment and Equipment Inventory Form. Payment received from OHS and tracked through the accounting system. Milestone Anticipated Start Date: May 15, 2017; Milestone Anticipated Completion Date: June 1, 2017.



# **Financial and Compliance Audit Report**

For audits of fiscal years beginning on or after December 26, 2014, subrecipients that expend \$750,000 or more from all Federal funding sources during their fiscal year are required to submit an organization-wide financial and compliance audit report. The audit must be performed in accordance with the requirements of Government and Accountability Office's (GAO) Government Auditing Standards, located at <a href="http://www.gao.gov/govaud/ybk01.htm">http://www.gao.gov/govaud/ybk01.htm</a>, and the requirements of Subpart F of 2 C.F.R. Part 200, located at <a href="http://www.ecfr.gov/cgi-bin/text-idx?SID=55e12eead565605b4d529d82d276105c&node=2:1.1.2.1.1.6&rgn=div6">http://www.ecfr.gov/cgi-bin/text-idx?SID=55e12eead565605b4d529d82d276105c&node=2:1.1.2.1.1.6&rgn=div6</a>.

# **Monitoring**

Subrecipients will be monitored on an annual and as needed basis by the OHS staff, both programmatically and financially, to ensure project activities and project goals, objectives, performance requirements, timelines, milestone completion, budgets, and other related program criteria are being met. Monitoring may be accomplished through either a desk-based review or on-site monitoring visit, or both. Monitoring will involve the review and analysis of the financial, programmatic, performance, compliance and administrative processes, policies, activities, and other attributes of each Federal assistance award and will identify areas where technical assistance, corrective actions and other support may be needed.

## **Grant Close-Out Process**

Within 30 days after all work is completed or the end of the period of performance, whichever comes first, subrecipients must submit a final status report detailing all accomplishments and a

qualitative summary of the impact of those accomplishments throughout the period of performance. After these reports have been reviewed and approved by the OHS, a close-out notice will be completed to close out the grant. The notice will indicate the period of performance as closed, list any remaining funds that will be de-obligated, and address the requirement of maintaining the grant records for three years from the date of the close-out. As part of the final report, subrecipients must submit an inventory report of all equipment acquired using program funds.

In addition, any SHSP subrecipient that issues sub-awards to any subrecipient is responsible for closing out those sub-awards as described in 2 C.F.R. § 200.343. SHSP subrecipients must ensure that they complete the closeout of their sub-awards in time to submit all necessary documentation and information to the OHS during the closeout of their own grant award.

# **VII. Contact Information**

The OHS is the designated State Authorized Agency (SAA) for the State of Missouri. The OHS manages and administers the SHSP grant. For more information please contact:

- Bruce Clemonds, Administrator: 573-522-6125
- Joni McCarter, Grant Specialist Supervisor: 573-526-9020
- Carrie Kiesling, Grant Specialist: 573-526-9140
- Michelle Branson, Grant Monitoring Specialist: 573-526-9014

# VIII. Other Critical Information

# **National Preparedness**

OHS coordinates with local, state, and federal government as well as the private and nonprofit sectors to facilitate an all-of-nation/whole community, risk driven, and capabilities-based approach to preparedness. This approach is grounded in the identification and assessment of risk through the THIRA. Local jurisdictions must maintain and update their THIRAs (as applicable) or participate in the development and update of the State/Regional THIRA, and State Preparedness Report (SPR), annually to ensure that the community's shared understanding of risk evolves to account for changes in the risk landscape, including successful mitigation efforts, emerging threats, hazards, and associated consequences.

# National Incident Management System (NIMS) Implementation

Prior to allocation of any Federal preparedness awards in FY 2016, subrecipients must ensure and maintain adoption and implementation of NIMS. Emergency management and incident response activities require carefully managed resources (personnel, teams, facilities, equipment and/or supplies) to meet incident needs. Utilization of the standardized resource management concepts such as typing, inventorying, and cataloging promote a strong national mutual aid capability needed to support delivery of core capabilities. Additional information on resource management and national Tier I NIMS Resource Types can be found at <a href="http://www.fema.gov/resource-management">http://www.fema.gov/resource-management</a>.

DHS/FEMA developed the NIMS Guideline for Credentialing of Personnel to describe national credentialing standards and to provide written guidance regarding the use of those standards. This guideline describes credentialing and typing processes, and identifies tools which Federal Emergency Response Officials (FEROs) and emergency managers at all levels of government may use both routinely and to facilitate multijurisdictional coordinated responses.

Although state, local, Tribal, and private sector partners—including nongovernmental organizations—are not required to credential their personnel in accordance with these guidelines; DHS/FEMA strongly encourages them to do so in order to leverage the Federal investment in the Federal Information Processing Standards (FIPS) 201 infrastructure and to facilitate interoperability for personnel deployed outside their home jurisdiction. Additional information can be found at

http://www.fema.gov/pdf/emergency/nims/nims\_alert\_cred\_guideline.pdf

# **Environmental Planning and Historic Preservation (EHP) Compliance**

The OHS is required to consider the effects of its actions on the environment and/or historic properties to ensure that all activities and programs funded by the agency, including grantsfunded projects, comply with Federal EHP regulations, laws and Executive Orders as applicable. Subrecipients proposing projects that have the potential to impact the environment, including but not limited to construction of communication towers, modification or renovation of existing buildings, structures and facilities, or new construction including replacement of facilities, must participate in the EHP review process. The EHP review process involves the submission of a detailed project description that explains the goals and objectives of the proposed project along with supporting documentation to the OHS. The OHS submits completed EHP packets to FEMA who then may determine whether the proposed project has the potential to impact environmental resources and/or historic properties. In some cases, FEMA is also required to consult with other regulatory agencies and the public in order to complete the review process. The EHP review process must be completed before funds are released to carry out the proposed project.

# **SAFECOM Guidance for Emergency Communications Grant Compliance**

Subrecipients who receive awards under SHSP that wholly or partially provide funding for emergency communication projects and related activities must comply with the most recent version of the *SAFECOM Guidance on Emergency Communications Grants*. This guidance provides recommendations to recipients regarding interoperable emergency communications projects, including allowable costs, eligible activities, grants management best practices for emergency communications grants, and information on technical standards that ensure greater interoperability. The guidance is intended to ensure that Federally-funded investments are compatible, interoperable, and support the national goals and objectives for improving emergency communications nationwide. Subrecipients investing in broadband-related investments should review *IB 386*, Clarification on Use of DHS/FEMA Public Safety Grant Funds for Broadband-Related Expenditures and Investments, and consult their OHS Grant Specialist on such investments before developing applications.

# **Emergency Operations Plan (EOP)**

Subrecipients, who normally maintain an EOP, must update their EOP at least once every two years to comply with the Comprehensive Preparedness Guide (CPG) 101 Version 2.0, Developing and Maintaining Emergency Operations Plans.

# Threat and Hazard Identification and Risk Assessment (THIRA)

FY 2016 SHSP award subrecipients must participate in the update of their Regional THIRA.

## **Conflict of Interest**

To eliminate and reduce the impact of conflicts of interest in the award process, subrecipients, and reviewers must follow their own policies and procedures regarding the elimination or reduction of conflicts of interest when making sub-awards. Subrecipients are also required to follow any applicable state or local statutes or regulations governing conflicts of interest in the making of sub-awards.

The subrecipient must disclose to the respective Grant Specialist, in writing, any real or potential conflict of interest as defined by the federal, state or local statutes or regulations or their own existing policies, which may arise during the administration of the Federal award within five days of learning of the conflict of interest. Similarly, subrecipients must disclose any real or potential conflict of interest to the pass-through entity.

#### **Extensions**

Extensions to this program are allowed. Extensions to the initial period of performance identified in the award will only be considered through formal, written requests to the subrecipient's respective OHS Grant Specialist and must contain specific and compelling justifications as to why an extension is required. All extension requests must address the following:

- Grant program, fiscal year and award number;
- Reason for delay this must include details of the legal, policy, or operational challenges being experienced that prevent the final outlay of awarded funds by the applicable deadline;
- Current status of the activity/activities;
- Approved period of performance termination date and new project completion date;
- Amount of funds drawn down to date;
- Remaining available funds, both Federal and non-Federal;
- Budget outlining how remaining Federal and non-Federal funds will be expended.
- Plan for completion, including milestones and timeframes for achieving each milestone and the position/person responsible for implementing the plan for completion; and
- Certification that activity/activities will be completed within the extended period
  of performance without any modification to the original Statement of Work, as
  described in the narrative and approved by OHS.

Subrecipients must submit all proposed extension requests to OHS for review and approval no later than 120 days prior to the end of the period of performance. Extensions are typically granted for no more than a three month time period.

# Training and Exercise Plan (TEP)

Subrecipients are required to develop a TEP that identifies training and exercise priorities and activities. The TEP shall be submitted to OHS no later than October 1, annually.

# **Multiple Purpose or Dual-Use of Funds**

Many activities which support the achievement of target capabilities related to terrorism preparedness may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. However, all SHSP funded projects must assist subrecipients in achieving target capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism and catastrophic events.

#### Personnel

HSGP funds may not be used to support the hiring of any personnel for the purposes of fulfilling traditional public health and safety duties or to supplant traditional public health and safety positions and responsibilities.

# Controlled Equipment (SHSP, UASI, and OPSG)

Grant funds may be used for the purchase of Controlled Equipment; however, because of the nature of the equipment and the potential impact on the community, there are additional and specific requirements in order to acquire this equipment.

Refer to IB 407 *Use of Grant Funds for Controlled Equipment* for the complete *Controlled Equipment List,* information regarding the *Controlled Equipment Request Form,* and a description of the specific requirements for acquiring controlled equipment with grant funds. For additional information on controlled equipment refer to Executive Order (EO) 13688 Federal Support for Local Law Enforcement Equipment Acquisition, and the Recommendations Pursuant to Executive Order 13688.

#### Unallowable Costs

Per FEMA policy, the purchase of weapons and weapons accessories is not allowed with HSGP funds.